

EXHIBIT C



U.S. Department of Justice

Carmen M. Ortiz
United States Attorney
District of Massachusetts

Main Reception: (617) 748-3100

John Joseph Moakley United States Courthouse
1 Courthouse Way
Suite 9200
Boston, Massachusetts 02210

September 26, 2014

BY HAND DELIVERY

William Fick, Esq.
Timothy Watkins, Esq.
Judy Clarke, Esq.
David Bruck, Esq.
Federal Defender's Office
51 Sleeper Street, 5th Floor
Boston, MA 02210

Re: United States v. Dzhokhar Tsarnaev, Crim. No. 13-10200- GAO

Dear Counsel:

We are writing in response to your letters of September 9, 2014, and September 12, 2014, seeking additional information in the above-captioned case, and we are providing some additional information.

[REDACTED]

We decline this request for several reasons. First, it is untimely. We originally produced the information on June 9, 2014. You waited six weeks to follow up. We responded within two weeks, and you waited another four weeks to reply. We are now approaching the trial date and many more important matters are at hand. It is too late at this point to be seeking additional information about materials we first produced over three months ago.

Second, we have already provided all of the information about these materials that is even arguably subject to the rules of discovery. [REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

With respect to your September 12 requests, we note that the time for discovery is long past. We therefore decline all of those requests except to the extent that they seek information actually required at this time by law.

Requests 1, 2. Recordings of phone calls made by your client between 06-18-14 and 09-10-14 are on the enclosed disk labelled DT-0073661 – DT-0073809.

Requests 3, 4, 5. We will ask FBI to make copies of these items for you.

Request 6. We will provide Jencks material for testifying witnesses when it becomes due.

Requests 7 & 8. To the extent this request seeks information within the compass of Local Rule 116.2(b)(2)(C), we will produce it 21 days before trial. Otherwise, we are aware of no legal basis for this request and therefore decline it.

Request 9. All material responsive to this request has previously been provided in discovery.

Request 10. To the extent this request seeks material the government is obligated to produce under Rule 16(a)(1)(F), we have produced it already.

Request 11. We will ask FBI to make copy of this item for you.

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Request 12. All of the digital devices that the government intends to introduce in its case in chief have already been produced.

Request 13. This appears to be a request for us to help you prepare your case, not a request for discovery.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. High-resolution copies of known fingerprint exemplars are on the enclosed disk labelled DT-0073661 – DT-0073809

4. [REDACTED]

5. Total Station data for the Boylston Street bombing scene is on the enclosed disk labelled DT -0073660.

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6. Additional tips and leads of the same general nature as those you reviewed previously have been added to the stand-alone computer in the U.S. Attorney's Office. They are available for your review.

Sincerely,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Alope /Chakravarty
Alope Chakravarty
William Weinreb
Nadine Pellegrini
Assistant U.S. Attorneys